



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 9 11 30 AM '14

JUN 27 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 8848
RETURN RECEIPT REQUESTED

Ms. Karen Raschke
Environmental Engineer
Ford Motor Company Dearborn Stamping Plant
3001 Miller Road
Dearborn, Michigan 48121

Re: Notice of Violation
Ford Motor Company, Dearborn, Michigan
MID 005 379 797

Dear Ms. Raschke:

On February 11, 2014, representatives of the United States Environmental Protection Agency and Michigan Department of Environmental Quality (MDEQ) inspected the Ford Motor Company Stamping Plant (Ford Stamping Plant) facility located at 3001 Miller Road in Dearborn, Michigan. The purpose of the inspection was to evaluate Ford Stamping Plant's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA). The inspection focused upon those regulations related to the generation and accumulation of hazardous waste. Enclosed is a copy of the inspection report including photographs taken during the inspection for your reference.

Based on information provided by Ford Stamping Plant personnel, review of records, and physical observations by the inspectors, EPA has determined that the Ford Stamping Plant violated certain requirements of the Michigan Administrative Code (MAC) and the United States Code of Federal Regulations (CFR). We find that Ford Stamping Plant did not comply with the following requirements:

- 1) To avoid the need for a hazardous waste storage operating license, a large quantity generator must comply with MAC Rule 299.9306(1) [40 C.F.R. § 262.34(a)]. See, MAC Rule 299.9306(1) [40 C.F.R. § 262.34(a)]. A generator may accumulate hazardous waste on-site for 90 days or less without a construction permit or an operating license if he or she complies with all of the following requirements of MAC Rule 299.9306(1)(a) through (g). Specifically, when the waste is placed in containers, the generator must comply with 40 CFR Part 265, Subparts I, AA, B, and CC, the generator complies with the containment requirements of 40 CFR § 264.175, and the generator documents the inspections required pursuant to 40 CFR § 265.174. See, MAC Rule 299.9306(1)(a)(i)

[40 CFR § 262.34(a)(1)(i)]. A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. See, 40 CFR § 265.173(a).

During the inspection of the Ford Stamping Plant hazardous waste less than 90 day accumulation area at column B-1-21, the inspectors observed an open 5-gallon container of hazardous waste, see photograph number 3. At the time of the inspection, therefore, the Ford Stamping Plant failed to comply with the closed container requirement. See, 40 CFR § 265.173(a). On February 11, 2014, Ford Stamping Plant personnel sent an e-mail to EPA stating that the 5-gallon hazardous waste container without a lid had been corrected, and attached a photograph of the covered container. EPA considers this violation resolved.

- 2) To avoid the need for a hazardous waste storage operating license, a large quantity generator must comply with MAC Rule 299.9306(1) [40 C.F.R. § 262.34(a)]. See, MAC Rule 299.9306(1) [40 C.F.R. § 262.34(a)]. A generator may accumulate hazardous waste on-site for 90 days or less without a construction permit or an operating license if he or she complies with all of the following requirements of MAC Rule 299.9306(1)(a) through (g). Specifically, when the waste is placed in containers, the generator must comply with 40 CFR Part 265, Subparts I, AA, B, and CC, the generator complies with the containment requirements of 40 CFR § 264.175, and the generator documents the inspections required pursuant to 40 CFR § 265.174. The owner or operator must record inspections in an inspection log or summary. The generator must maintain the inspection records on-site for a period of not less than 3 years from the date of the inspection. See, MAC Rule 299.9306(1)(a)(i) [40 CFR § 262.34(a)(1)(i)].

During the records review portion of the inspection, the inspectors reviewed the weekly inspection logs. Inspector Francis observed that the outside "lead paint roll-off box" was not noted in the weekly inspection log dated 1/29/2014. At the time of the inspection, therefore, the Ford Stamping Plant failed to comply with the weekly inspection log recordkeeping requirement. See, MAC Rule 299.9306(1)(a)(i) [40 C.F.R. § 262.34(a)(1)(i)].

- 3) To avoid the need for a hazardous waste storage operating license, a large quantity generator must comply with MAC Rule 299.9306(1) [40 C.F.R. § 262.34(a)]. See, MAC Rule 299.9306(4) [40 C.F.R. § 262.34(d)]. The generator must comply with the requirements for owners or operators in 40 CFR Part 265, Subparts C and D, and 40 CFR § 265.16 and 40 CFR § 268.7(a)(5). See, MAC Rule 299.9306(1)(d) [40 CFR § 262.34(a)(4)]. Specifically, facility personnel must successfully complete a program of class-room instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. See, 40 CFR § 265.16(a)(1). This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. See, 40 CFR §

265.16(a)(2).

During the records review portion of the inspection, the inspectors reviewed Ford Stamping Plant personnel training records. Inspector Francis asked Ford Stamping Plant personnel about Veolia personnel training records. Ford Stamping Plant personnel told the inspectors that Veolia personnel who work on-site and manage hazardous waste do not receive site specific hazardous waste training, including contingency plan implementation. At the time of the inspection, therefore, Ford Stamping Plant failed to comply with the hazardous waste training requirements. See, MAC Rule 299.9306(1)(d) [40 CFR § 262.34(a)(4) and 265.16(a)(2)].

- 4) Used oil generators are subject to all applicable Spill Prevention Control and Countermeasures requirements (40 CFR Part 112) in addition to the requirements of MAC R 299.9810(3) and 40 CFR Section 279.22. Containers and aboveground storage tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, MAC Rule 299.9810(3) [40 CFR § 279.22(c)(1)].

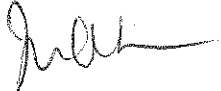
During the inspection of the API Processing Area, the inspectors observed three used oil accumulation tanks. The two white tanks were not labeled "Used Oil", see photograph number 7. At the time of the inspection, therefore, Ford Stamping Plant failed to label or mark all the tanks with the words "Used Oil" as required by MAC Rule 299.9810(3) [40 CFR § 279.22(c)(1)].

At this time, EPA is not requiring Ford Stamping Plant to apply for a storage license so long as Ford Stamping Plant immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Walt Francis, U. S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Jim Day, MDEQ – Southeast Michigan District Office (dayj@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: FORD MOTOR COMPANY
DEARBORN STAMPLING PLANT

FACILITY U.S. EPA ID NO.: MID 005 379 797

FACILITY TYPE: Large Quantity Generator

FACILITY ADDRESS: 3001 Miller Road
Dearborn, Michigan 48120

U.S. EPA REPRESENTATIVE: Walt Francis

DATE OF INSPECTION: February 11, 2014

SIC CODE: 3714 – Motor Vehicle Parts and Accessories

NAICS CODE: 336370 – Motor Vehicle Metal Stamping

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

2/26/2014
Date

ACCEPTED BY: Julie Morris
Julie Morris, Chief
Compliance Section 2
RCRA Branch

2/27/14
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the Ford Motor Company Dearborn Stamping Plant (Ford) facility located at 3001 Miller Road, Dearborn, Michigan to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Michigan Administrative Code (MAC), with respect to Ford's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Michigan Department of Environmental Quality (MDEQ) Inspector -
James Day, Environmental Quality Analyst

Representatives of Ford Motor Company -
Karen Raschke, Environmental Engineer
Eric Czarniowski, Environmental Management Representative
Kim Cole, Environmental Engineer
Tamberlyn Reid, Environmental Engineer
Mark Gornick, Environmental Engineer
Dan Esch, Veolia
Lecedra Welch, Veolia

Site Description/Background Information

The Ford Rouge facility in Dearborn, Michigan consists of: Ford Tool and Die; Ford Dearborn Division; Ford Engine Plant; Ford Truck Plant; Ford Rouge Construction Services; and the Ford Dearborn Stamping Plant. At the time of the inspection, the Ford Dearborn Stamping Plant was stamping and assembling doors and hoods. The Ford Dearborn Stamping Plant has approximately 650 employees and operates two shifts. The Ford Stamping Plant has been at this location since 1938. Recently, the Ford Dearborn Stamping Plant has taken over part of the Ford Rouge Engine Plant second floor for assembly operations. This new area is covered under the Ford Dearborn Stamping Plant hazardous waste U.S. EPA ID number. Vehicle doors and hoods are stamped, assembled and sent to the Ford Body Shop or loaded onto rail cars. The Ford Dearborn Stamping Plant has a U.S. EPA ID number (MID005379797) and operates as a Large Quantity Generator (LQG) of hazardous waste. Hazardous wastes are generated in various locations in the Ford facility and are taken to one of three hazardous waste less-than 90 day accumulation areas. At the time of the inspection, the Ford facility was operating as an LQG of hazardous waste, and generates hazardous waste at 13 satellite accumulation areas (SAAs). Based on information in the MDEQ Waste Data System (WDS), historical hazardous waste streams have included: D001 (ignitable); D035 (MEK); U002 (acetone); U210

(tetrachloroethylene); U220 (toluene); D008 (lead); F003 (spent non-halogenated solvents); D003 (reactive); D002 (corrosive); and F002 (spent halogenated solvents). Other wastes include: 1) used fluorescent lamps; 2) used rags; 3) used antifreeze; and 4) used oil. The MDEQ WDS out-bound manifest report indicates that hazardous waste is shipped to Safety-Kleen Systems, Inc., Romulus, Michigan (MID985663251); Safety-Kleen Systems, Inc., Smithfield, Kentucky (KYD053348108); Veolia ES Technical Solutions LLC, Sauget, Illinois (ILD098642424); Clean Harbors El Dorado LLC, El Dorado, Arkansas (ARD069748192); USA Lamp and Ballast, Cincinnati, Ohio (OH0000169402); EQ Detroit, Inc., Detroit, Michigan (MID980991566); and Veolia ES Technical Solutions, LLC, Menomonee Falls, Wisconsin (WID003967148) approximately one shipment every one to two months.

Opening Conference

U.S. EPA representative Walt Francis and MDEQ representative James Day arrived at the Ford Rouge Security Office at approximately 8:00 a.m. Inspectors Francis and Day introduced themselves to Ms. Karen Raschke, Environmental Engineer. Ms. Raschke took the inspectors to her office in the Dearborn Stamping Plant, Room 215-6. Ms. Raschke introduced Mr. Eric Czarniowski, Environmental Management Representative, Ms. Kim Cole, Environmental Compliance Engineer, and Ms. Tamberlyn Reid, Environmental Engineer. Inspector Francis presented his credentials, and informed them of the nature, scope, and procedures of the inspection. Ms. Raschke introduced Ms. Lecedra Welch with Veolia. The inspection was conducted by U.S. EPA and MDEQ personnel with U.S. EPA being the lead enforcement agency. Ms. Raschke provided the inspectors with a brief overview of the Ford Rouge facility, and provided information on the various hazardous waste, universal waste, used oil, and solid wastes that are generated, and shipped off-site from the Ford Dearborn Stamping Plant. Specifically, Ms. Raschke explained that hazardous wastes were generated at the Paint Shop, throughout the plant during lead paint debris removal, and used aerosol cans are generated in various departments. Also, Ms. Raschke explained that used fluorescent lamps are accumulated in the "Lamp and Ballast Crib". Inspector Francis asked Ms. Raschke about off-site shipments of used oil. Ms. Raschke told the inspectors that used oil is generated from the stamping presses and scrubbers and is picked up by Safety-Kleen, Romulus, Michigan. Ford personnel did not make a Confidential Business Claim on the information gathered during the inspection. Ms. Raschke allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began at the TR-1 Press Area. Ms. Raschke showed the inspectors a 55-gallon used oil container and a container of used oil filters. The walk-through continued to the Maintenance Shop. Ms. Raschke showed the inspectors a container of spent propane cylinders labeled "Hazardous Waste D001". The walk-through continued to the "Lamp and Ballast Crib" (see photograph number 2). Ms. Raschke showed the inspectors a 55-gallon container labeled "Hazardous Waste PCB Ballast" dated 6/18/2013 (see photograph number 1), a 55-gallon container of broken fluorescent lamps labeled "D009", a container labeled "Used Batteries"

dated 5/9/2013, and two containers labeled "Electric Lamps" with accumulation dates of 10/9/2013 and 1/6/2014. The walk-through continued to the Maintenance Kiosk Waste Collection Area. Ms. Raschke showed the inspectors a container for oily rags, a container for used aerosol cans, and a trash container. Inspector Francis noted that the "Used Aerosol" container included the hazardous waste codes "D001, D035, U002, U210, and U220". The walk-through continued to the "Main Crib". Ms. Raschke showed the inspectors a used battery accumulation container dated 5/30/2013 and a 55-gallon container for used aerosols. The walk-through continued to the B-1-21 less than 90-day hazardous waste accumulation area. The inspectors observed two 55-gallon containers of D008 lead waste dated 1/4/2014, see photograph numbers 5 and 6. Inspector Francis observed a 5-gallon container labeled D001, 1/16/2014, "Pending Analysis" which was uncovered, see photograph number 3. Other containers included: 55-gallon container labeled "Paint and Solvents, 12/16/2013"; 5-gallon container labeled "Blasting Caps, D001, 1/13/2014"; small cardboard container labeled "Traffic Film" (see photograph number 4). The walk-through continued to the new API process area. Ms. Raschke showed the inspectors an oily sludge lugger box, two white poly tanks (see photograph number 7), and a black tank labeled "Used Oil" on one side and "Waste Oil" on the other side. The walk-through continued to an outside roll-off box of oily waste labeled "2144". The walk-through continued to the Hi-Lo Maintenance Shop. Ms. Raschke showed the inspectors a used aerosol SAA container, a parts washer labeled "TOX #138103", a 55-gallon used oil container, a 55-gallon used oil filter container, a 55-gallon used antifreeze container, and a used oil collection device labeled "Used Oil". The walk-through continued outside. Ms. Raschke showed the inspectors a roll-off box used to accumulate hazardous waste lead paint chips by an on-site contractor. Inspector Francis noted that the roll-off box was labeled "Lead Paint Chips" with a "1/13/2014" accumulation date, see photograph number 8. The walk-through continued to the new second floor area in the Engine Plant. Ms. Raschke told the inspectors that this area had a 55-gallon SAA container for used aerosols. The walk-through continued to the Jier Press Area. Mr. Czarniowski showed Inspector Francis how doors are stamped in the press. The walk-through continued to Die Press Area D-2-20. Ms. Raschke showed the inspectors a 55-gallon used aerosol SAA container. The walk-through continued to the Painters Crib. Ms. Raschke showed the inspectors a 55-gallon used aerosol SAA container outside the Painters Crib. Inside the Painters Crib, the inspectors observed a Safety-Kleen parts washer and two 55-gallon less than 90 day hazardous waste containers. Inspector Francis observed that one was labeled "Paint and Solvent Waste" with a 11/19/2013 accumulation date (see photograph number 8), and the other was labeled "Solvent and Paint Rags" with a 2/4/2014 accumulation date.

The inspection group then returned to Ms. Raschke's office to review records.

Records Review

The inspectors reviewed three years of hazardous waste manifest records, waste determination records, contingency plan, weekly inspection records, and personnel training records. The inspectors reviewed waste determination records from Test America dated April 16, 2013. The last off-site shipment of hazardous waste was on October 8, 2013. The last universal waste lamp shipment was on September 4, 2013 to Clean Lites, Mason, Michigan. Mr. Duane Washington

and Mr. Derrick Davis received annual personnel training in 2012 and 2013. Ms. Raschke provided the inspectors with a December 2013 version of the Contingency Plan.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Ford would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed the open 5-gallon container in the B-1-21 hazardous waste accumulation area and the two 55-gallon hazardous waste containers in the Painters Crib. Inspector Day discussed aisle space and housekeeping at Area B-1-21. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and an Ohio EPA Pollution Prevention Assistance brochure to Ms. Raschke.

Attachments

Inspection Checklists.

Photographs.

Department of Environmental Quality
HAZARDOUS WASTE INSPECTION

INSPECTION DATE 2/11/2014 GEN. I.D.# MID 005 379 797 WDS ID# 393646

SITE SPECIFIC NAME Ford Motor Company Dearborn Stamping Plant

SITE LOCATION ADDRESS 3001 Miller Road, Dearborn, Michigan 48120

CITY _____ ZIP: _____ COUNTY _____

Reason for Inspection: ☒ CEI ☐ FCI ☐ FUI ☐ CSE ☐ CAC ☐ COMPLAINT ☐ NRR ☐ OTHER

WASTE CODE	PROCESS WASTE IS GENERATED FROM	
D001 <u>10035</u>	<u>Aerosol</u>	
D033	<u>Empty Liquid</u>	
D008	<u>Lead Acid CHIPS-</u>	
F003	<u>Waste Paint</u>	

PERSON(S) INTERVIEWED	TITLE	TELEPHONE NUMBER
Karen Raschke	Hazardous Waste Contact	313-317-9198

INSPECTOR'S NAME	AGENCY	TELEPHONE NUMBER
Jim Day	MICHIGAN DEPT OF ENVIRONMENT QUALITY	586-753-3835
Walt Francis	U.S. EPA, Region 5	312-353-4921

PRIMARY BUSINESS OF FACILITY: Stamping Plant

APPROX./AVG. # OF EMPLOYEES: 650 DAYS/HRS OPERATION 2 SHIFTS

FACILITY SIZE 1,954,606 sq Feet PHOTOS TAKEN ☒ YES ☐ NO

CHRONOLOGY OF INSPECTION & AREAS INSPECTED :

- | | | |
|----------|----------|----------|
| 1) _____ | 4) _____ | 7) _____ |
| 2) _____ | 5) _____ | 8) _____ |
| 3) _____ | 6) _____ | 9) _____ |

[illegible]

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
	C E S Q G
	LIW GENERATOR
	SMALL QUANTITY GENERATOR
	SMALL QUANTITY GEN TANK SYSTEM
X	GENERATOR
	GENERATOR TANK SYSTEM
X	SMALL QTY UNIVERSAL WASTE HANDLER
	LARGE QTY UNIVERSAL WASTE HANDLER
X	USED OIL ACTIVITIES
	TRANSPORTER <u>LIW</u> <u>HAZ WST</u>
	WOOD PRESERVER

Does Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of operation(s): ☒ DISTILLATION ☒ FRACTIONATION ☒ THIN-FILM EVAPORATION ☒ SOLVENT EXTRACTION ☒ AIR OR STREAM STRIPPING (If yes, send a copy of this cover sheet to AQD).

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
	SITE SPECIFIC PERMITTED T S D F
	PERMITTED GENERAL T S D F
	INTERIM GENERAL T S D F
	GENERATOR APPENDIX
	TANK SYSTEM
	PERMITTED SURFACE IMPOUNDMENT
	PERMITTED WASTE PILE
	PERMITTED LAND TREATMENT
	PERMITTED LANDFILL
	MISCELLANEOUS UNITS
	PERMITTED ORGANIC AIR EMISSIONS- PROCESS VENTS
	PERMITTED ORGANIC AIR EMISSIONS- EQUIPMENT LEAKS
	INTERIM GW MONITORING (USE WITH SUBPARTS K,L, M, & N)
	INTERIM SURFACE IMPOUNDMENT
	INTERIM WASTE PILE
	INTERIM LAND TREATMENT
	INTERIM LANDFILL
	INTERIM CHEMICAL, PHYSICAL & BIOLOGICAL TREATMENT
	INTERIM ORGANIC AIR EMISSIONS FROM PROCESS VENTS
	INTERIM ORGANIC AIR EMISSIONS FROM EQUIPMENT LEAKS

Robert J.

2/11/2014

Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name Ford Motor Company Dearborn Stamping Plant Part 3 Rules

Date 2/11/2014 ID# MID 005 379 797 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
D001/12025	Used Solvents	1 Drum / month
D035 (000)	Engine Light	
D008	Lead Paint (Chassis) + PPE	~ 20 gal / 600 / month
F003	Waste Paint	1 Drum or 50 lbs
D002		

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

(NI = Not inspected; N/A = Not applicable)

		YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	<input checked="" type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	<input checked="" type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306(1)(d): 40 CFR 268.7(a)(5))	262C	<input type="checkbox"/>	N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	<input checked="" type="checkbox"/>	NI N/A
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MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	<input checked="" type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:			
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
7. Submitted copy of manifests to Director no later than 10 days after month shipment was made? (Rule 304(2)(b))	262B	<input checked="" type="checkbox"/>	NI N/A
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3 rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	<input checked="" type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	<input checked="" type="checkbox"/>	NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	<input type="checkbox"/>	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42(a)(b))			
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:			
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:			
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input checked="" type="checkbox"/>	NI N/A

13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input checked="" type="checkbox"/>	NI N/A
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**LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))**

YES NO

14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	268A	<input checked="" type="checkbox"/> NI N/A
b) all characteristic wastes?	268A	<input checked="" type="checkbox"/> NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	<input checked="" type="checkbox"/> NI N/A
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OR

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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OR

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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OR

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	<input type="checkbox"/> NI N/A
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19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3)		
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a) EPA hazardous waste #?	268A	<input type="checkbox"/> NI N/A
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b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	<input type="checkbox"/> NI N/A
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c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	<input type="checkbox"/> NI N/A
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d) manifest number associated with the shipment?	268A	<input type="checkbox"/> NI N/A
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e) waste analysis data, where available?	268A	<input type="checkbox"/> NI N/A
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f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	<input type="checkbox"/> NI N/A
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UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	<input type="checkbox"/> NI N/A
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h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	<input type="checkbox"/> NI N/A
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20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3)		
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a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	<input type="checkbox"/> NI N/A
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b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	<input type="checkbox"/> NI N/A
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NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6)	268A	<input type="checkbox"/> NI N/A
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22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	<input type="checkbox"/> NI N/A
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23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8)	268A	<input checked="" type="checkbox"/> NI N/A
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NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	<input checked="" type="checkbox"/> NI N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	<input checked="" type="checkbox"/> NI N/A
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27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	<input checked="" type="checkbox"/> NI N/A
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PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

YES NO

28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said_obsrved <input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said_obsrved <input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said_obsrved <input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

OR

e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	<input type="checkbox"/> <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h))	262C	<input type="checkbox"/> <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	<input type="checkbox"/> <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
g) are containers compatible with waste in them (265.172)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
h) are containers stored closed? (265.173(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(i) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
e) are container(s) in good condition? (265.171)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		
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a) impervious base free of cracks? (264.175(b)(1)) :	262C	<input checked="" type="checkbox"/> NI N/A
b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	<input checked="" type="checkbox"/> NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	<input checked="" type="checkbox"/> NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	<input checked="" type="checkbox"/> NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	262C	<input checked="" type="checkbox"/> NI N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	<input checked="" type="checkbox"/> NI N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>Explain any yes answer.</i>		<input checked="" type="checkbox"/> NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	<input checked="" type="checkbox"/> NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	<input checked="" type="checkbox"/> NI N/A
40. Is hazardous waste accumulated in tanks? <i>If so, complete Tank System inspection form.</i>		<input checked="" type="checkbox"/> NI N/A
41. Is hazardous waste placed on drip pads? <i>If so, complete Wood Preserving inspection form</i>		<input checked="" type="checkbox"/> NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16)	<i>Vedra Annual Training</i>	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
43. Do personnel training records contain the following:			
a) job title? (265.16(d)(1))		262C	<input checked="" type="checkbox"/> NI N/A
b) job descriptions? (265.16(d)(2))		262C	<input checked="" type="checkbox"/> NI N/A
c) name of employee filling each job? (265.16(d)(1))		262C	<input checked="" type="checkbox"/> NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))		262C	<input checked="" type="checkbox"/> NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))		262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
f) records of training? (265.16(d)(4))		262C	<input checked="" type="checkbox"/> NI N/A
g) do new personnel receive required training within 6 months? (265.16(b))		262C	<input checked="" type="checkbox"/> NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	<i>11/2013</i>	262C	<input checked="" type="checkbox"/> NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	<i>Karen + Mark</i>	262C	<input checked="" type="checkbox"/> NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	co.said_obsrvd_ <input checked="" type="checkbox"/> NI N/A
45. If required, does this facility have the following:		
a) internal communications or alarm systems? (265.32(a))	262C	<input checked="" type="checkbox"/> NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	<input checked="" type="checkbox"/> NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	<input checked="" type="checkbox"/> NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	<input checked="" type="checkbox"/> NI N/A
46. Testing and Maintenance of Emergency Equipment		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	<input checked="" type="checkbox"/> NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable only if required (40 CFR 265.32)		
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	<input checked="" type="checkbox"/> NI N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	<input checked="" type="checkbox"/> NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	<input checked="" type="checkbox"/> NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	<input checked="" type="checkbox"/> NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	<input checked="" type="checkbox"/> NI N/A
49. Does the contingency plan contain the following:		
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	<input checked="" type="checkbox"/> NI N/A

Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER
(SQH) INSPECTION

Facility Name Ford Motor Company Dearborn Stamping Plant Part 2 Rules

Date 2/11/2014 I.D. # MID 005 379 797 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or more of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

YES NO

1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	<input checked="" type="checkbox"/> NI NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	<input checked="" type="checkbox"/> NI NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4))

QTY HANDLED:

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	<input checked="" type="checkbox"/> NI NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	<input type="checkbox"/> X NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.B	<input type="checkbox"/> NI NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	<input checked="" type="checkbox"/> NI NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	<input type="checkbox"/> NI NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) requirements)

QTY HANDLED:

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a))	273.B	<input checked="" type="checkbox"/> NI NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	<input checked="" type="checkbox"/> NI NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	<input checked="" type="checkbox"/> NI NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> NI NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272, and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> NI NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> NI NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	<input checked="" type="checkbox"/> NI NI N/A

CONSUMER ELECTRONICS: (Rule 228(4))

QTY HANDLED:

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	<input checked="" type="checkbox"/> NI NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	<input checked="" type="checkbox"/> NI NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.B	<input type="checkbox"/> NI NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse (Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii); remove modular components for reuse (Rule 228(4)(g)(iii))	273.B	<input type="checkbox"/> X NI N/A

ELECTRIC LAMPS: (Rule 228(4) ; 273.13(c); 273.14(d))**QTY HANDLED:**

17. Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(i)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4)(c)(iii)) <i>9/4/13 Clean Lamps</i>	273.B	<input checked="" type="checkbox"/> NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(4)(c)(iv)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii) (B)) <i>Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste</i>	273.B	<input checked="" type="checkbox"/> NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	<input checked="" type="checkbox"/> NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	<input checked="" type="checkbox"/> NI N/A

MERCURY DEVICES: (Rule 228(4) ; 40 CFR 273.13 & 273.14**QTY HANDLED:**

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	<input checked="" type="checkbox"/> NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1)) <i>no mercury lamps in the facility</i>	273.B	<input type="checkbox"/> NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)". (Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	<input type="checkbox"/> NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	<input type="checkbox"/> NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	<input type="checkbox"/> NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	<input type="checkbox"/> NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	<input type="checkbox"/> NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(viii))	273.B	<input type="checkbox"/> NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	<input type="checkbox"/> NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i)(A&B), 273.13(c)(4)(i))	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	<input type="checkbox"/> NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	<input type="checkbox"/> NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)**QTY HANDLED:**

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	<input checked="" type="checkbox"/> NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	<input type="checkbox"/> NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	<input type="checkbox"/> NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	<input type="checkbox"/> NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) [See 273.14(c) if 273.14(b) not possible]	273.B	<input type="checkbox"/> NI N/A

PHARMACEUTICALS: (Rule 228(4)**QTY HANDLED:**

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	<input checked="" type="checkbox"/> NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii)) <i>John Ann</i>	273.B	<input checked="" type="checkbox"/> NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.B	<input checked="" type="checkbox"/> NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (iii))?	273.B	<input type="checkbox"/> NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	<input checked="" type="checkbox"/> NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	<input type="checkbox"/> NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	<input checked="" type="checkbox"/> NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	<input checked="" type="checkbox"/> NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	<input type="checkbox"/> NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	<input type="checkbox"/> NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	<input checked="" type="checkbox"/> NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	<input type="checkbox"/> NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	<input checked="" type="checkbox"/> NI N/A
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RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	<input checked="" type="checkbox"/> NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input checked="" type="checkbox"/> NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input checked="" type="checkbox"/> NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a)) <i>clean up</i>	273.B	<input checked="" type="checkbox"/> NI N/A
45. If the SQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b))	273.B	<input type="checkbox"/> NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	<input checked="" type="checkbox"/> NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	<input checked="" type="checkbox"/> NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	<input checked="" type="checkbox"/> NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2))	273.B	<input checked="" type="checkbox"/> NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	<input checked="" type="checkbox"/> NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	<input checked="" type="checkbox"/> NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a): 40 CFR 273.18(g))	273.B	<input checked="" type="checkbox"/> NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	<input checked="" type="checkbox"/> NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 & 6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	<input type="checkbox"/> NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	<input type="checkbox"/> NI N/A
c. provide copy of EPA Acknowledgment of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	<input type="checkbox"/> NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/markings/placards/shipping papers if universal waste is also hazardous material? <i>Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s."</i> <i>nor have waste added to USDOT proper shipping name.</i> (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a))	273.D	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

COMMENTS:

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

**USED OIL INSPECTION FORM – GENERATORS**Facility's Name Ford Motor Company Dearborn Stamping Plant

Part 8 Rules

Date 2/11/2014ID# MID 005 379 797

1994 PA 451

Note: Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable

YES NO

NI – Not Inspected, N/A – Not Applicable		YES	NO
1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:			
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA		<input checked="" type="checkbox"/>
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA		<input checked="" type="checkbox"/>
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA		<input checked="" type="checkbox"/>
d) mixture of used oil and fuel? (Rule 809(1)(d))	UOA		<input checked="" type="checkbox"/>
e) material which is produced from used oil & is burned for energy recovery? (Rule 809(1)(e))	UOA		<input checked="" type="checkbox"/>
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1)(f))			
i) maximum arsenic concentration of 5ppm	UOA		<input checked="" type="checkbox"/>
ii) maximum cadmium concentration of 2ppm	UOA		<input checked="" type="checkbox"/>
iii) maximum chromium concentration of 10ppm	UOA		<input checked="" type="checkbox"/>
iv) maximum lead concentration of 100ppm	UOA		<input checked="" type="checkbox"/>
v) minimum flash point of 100 degrees Fahrenheit	UOA		<input checked="" type="checkbox"/>
vi) maximum total halogen concentration of 4,000ppm	UOA		<input checked="" type="checkbox"/>
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA		<input checked="" type="checkbox"/>
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(h))	UOA		<input checked="" type="checkbox"/>
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA		<input checked="" type="checkbox"/>
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA		<input checked="" type="checkbox"/>
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA		<input checked="" type="checkbox"/>
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule 809(2)(b)(ii))	UOA		<input checked="" type="checkbox"/>
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed? (Rule 809(2)(c))	UOA		<input checked="" type="checkbox"/>
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA		<input checked="" type="checkbox"/>
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA		<input checked="" type="checkbox"/>
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA		<input checked="" type="checkbox"/>
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809(2)(g))	UOA		<input checked="" type="checkbox"/>
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA		<input checked="" type="checkbox"/>
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA		<input checked="" type="checkbox"/>
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809(2)(j))	UOA		<input checked="" type="checkbox"/>
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA		<input checked="" type="checkbox"/>
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m))	UOA		<input checked="" type="checkbox"/>
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA		<input checked="" type="checkbox"/>
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule 809(2)(o))	UOA		<input checked="" type="checkbox"/>
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA		<input checked="" type="checkbox"/>

GENERATOR REQUIREMENTS (Rule 810)

NOTE: Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25 gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer

		YES	NO
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4))	UOA	<input checked="" type="checkbox"/>	NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	<input checked="" type="checkbox"/>	NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	<input checked="" type="checkbox"/>	NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1)) <i>2 poly drums API 1w</i>	UOA	<input checked="" type="checkbox"/>	NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	<input type="checkbox"/>	NI N/A
6. Upon detection of a release does the facility:			
a) stop the release? (40 CFR 279.22(d)(1))	UOA	<input checked="" type="checkbox"/>	NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	<input checked="" type="checkbox"/>	NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	<input checked="" type="checkbox"/>	NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	<input checked="" type="checkbox"/>	NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER (Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):			
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	<input checked="" type="checkbox"/>	NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour? (40 CFR 279.23(b))	UOA	<input type="checkbox"/>	NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	<input type="checkbox"/>	NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL (Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24) <i>Sisley - 1100 Romulus, MS MD 985667251</i>	UOA	<input checked="" type="checkbox"/>	NI N/A
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OR

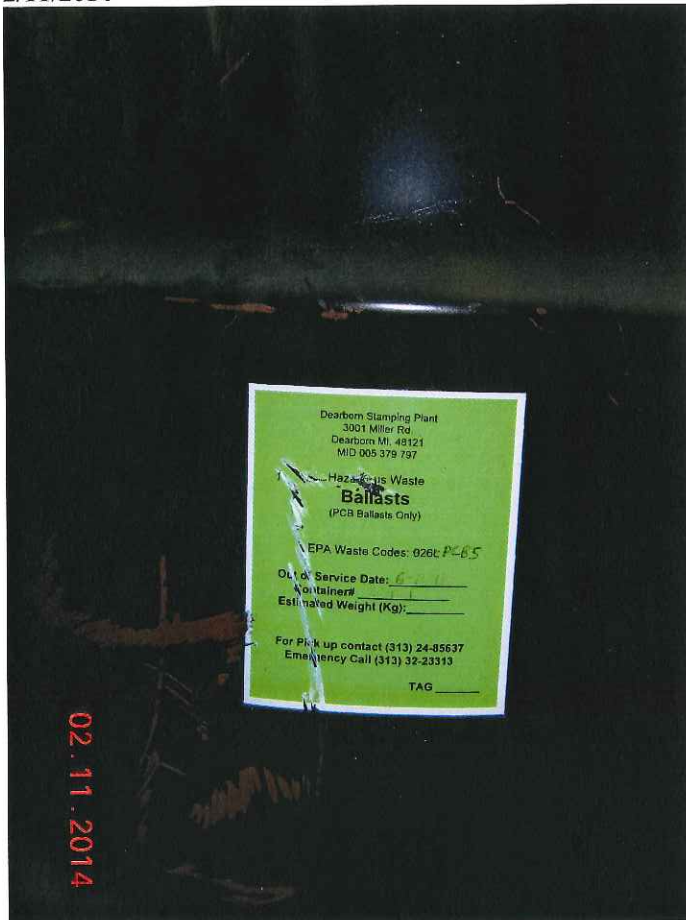
9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?			
a) self transportation of small amounts to approved collection centers provided that the generator transports:			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	<input type="checkbox"/>	NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	<input type="checkbox"/>	NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))			
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA	<input type="checkbox"/>	NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	<input type="checkbox"/>	NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	<input type="checkbox"/>	NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	<input type="checkbox"/>	NI N/A

COMMENTS:-

Ford Motor Company
Dearborn Stamping Plant
Dearborn, Michigan
2/11/2014



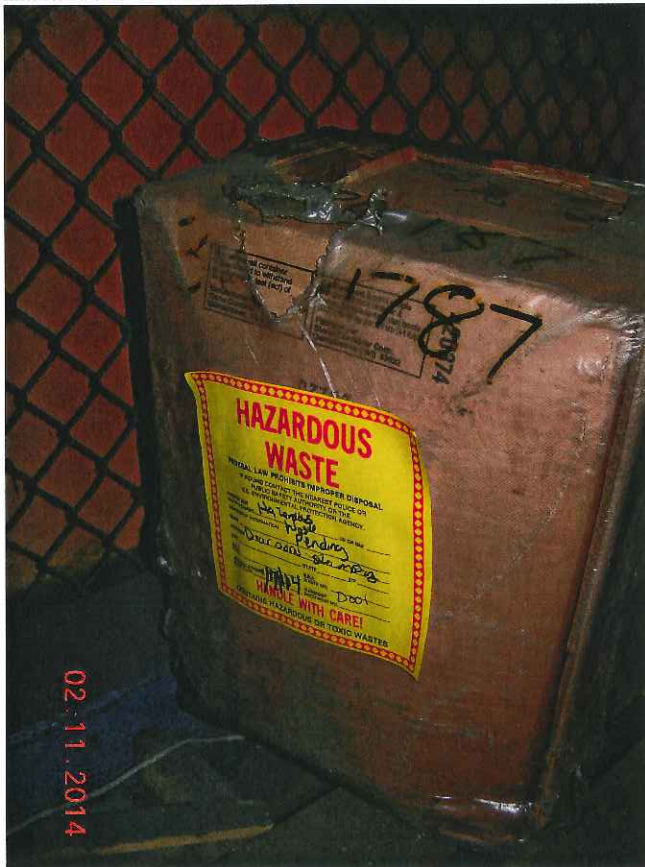
Photograph #1 – Lamp and Ballast Crib, 55-Gallon Container of PCB Ballasts



Photograph #2 – Lamp and Ballast Crib, Containers of Used Lamps and PCB Ballasts



Photograph #3 – Hazardous Waste Less Than 90 Day Accumulation Area B-1-21, 5-Gallon Hazardous Waste Container Labeled “D001” and “1/16/2014” and “Pending Analysis”

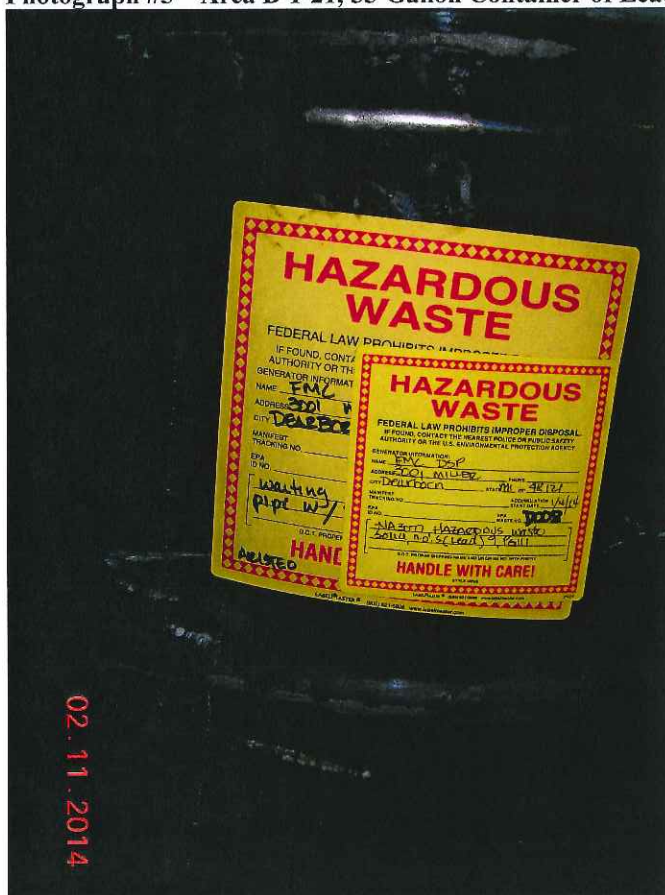


Photograph #4 – Area B-1-21, Hazardous Waste Pending Container

Ford Motor Company
Dearborn Stamping Plant
Dearborn, Michigan
2/11/2014



Photograph #5 – Area B-1-21, 55-Gallon Container of Lead Paint Chips (D008), 1/4/2014



Photograph #6 – Area B-1-21, 55-Gallon Container of Lead Paint Chips (D008), 1/4/2014



Photograph #7 – API Process Area, Storage Tanks Prior To Processing



Photograph #8 – Outside of Hi-Lo Maintenance Shop, Roll-Off Box of Hazardous Waste Lead Paint Chips, Accumulation Date 1/13/2014

Ford Motor Company
Dearborn Stamping Plant
Dearborn, Michigan
2/11/2014



Photograph #8 – Painters Crib, 55-Gallon Less Than 90 Day Accumulation Container of Paint and Solvent Waste, D001/D035/F003/F005, Accumulation Date 11/19/2013

